

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
Jourrell Dontai WILLIAMS) Case No.)
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 25, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 USC 1324	Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

Continued on the attached sheet.

/S/Brandy M. Ochoa-Hauser

Complainant's signature

Brandy M. Ochoa-Hauser, **Border Patrol Agent**
Printed name and title

Sworn to before me and signed in my presence,

Date: November 29, 2021

Judge's signature

City and state: Laredo, Texas

Christopher dos Santos, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA**CRIMINAL COMPLAINT****V.**

Jourrell Dontai WILLIAMS

Case Number:

On November 25, 2021, Border Patrol Agents (BPAs) were working at the Laredo North Border Patrol Checkpoint, located on Interstate Highway 35 north of Laredo, Texas in Webb County. At approximately 8:35 a.m., a blue tractor approached the primary truck inspection lane.

The BPA greeted the driver of tractor, Jourrell Dontai Williams, and asked him if he was traveling by himself today. Williams stated he was traveling alone. A BPA canine handler was performing a non-intrusive free air sniff utilizing his service canine, when his canine alerted to the possible presence of concealed humans and/or narcotics near the toolbox of the tractor. The BPA canine handler asked Williams for consent to open the tractor's toolbox, he verbally agreed. The BPA canine handler opened the toolbox and found it was empty. The BPA canine handler requested the tractor to secondary inspection. The BPA referred the tractor to secondary for further inspection.

At secondary, an inspection of the tractor revealed eight subjects concealed inside the sleeper area of the cab, near the tractor's toolbox. An immigration inspection was conducted on all eight subjects. All eight subjects freely stated they were in the United States illegally and had no documentation to remain in the United States legally. Williams and the eight subjects were placed under arrest and escorted inside the checkpoint for further investigation.

Jourrell Dontai Williams was read his Miranda rights warning via service form I-214. Williams acknowledged his rights by signing the form but requested an attorney to be present if questioned.

Aaron Moya-Cabrera is a citizen of Mexico, serving as a material witness in the case against Jourrell Dontai Williams. Moya-Cabrera stated he crossed the Rio Grande River into the United States illegally on November 24, 2021. Moya-Cabrera stated he paid \$9,000 Mexican Pesos in Nuevo Laredo, Mexico to be allowed to stay at a hotel and proceed to get smuggled to arrive in Alabama. Moya-Cabrera stated once he crossed the river, he continued to walk until he arrived at an unknown street and was picked up by a white pick-up truck. Moya-Cabrera stated he was taken an unknown warehouse and spent the night there. Moya-Cabrera stated the same driver of the pick-up truck arrived at the warehouse to pick him up. Moya-Cabrera stated the driver of the pick-up truck took him to another warehouse where the blue tractor was parked. Moya-Cabrera stated Williams let them board his tractor. Moya-Cabrera stated he did not speak to Williams due to language barrier. Moya-Cabrera was shown a six-person photo line-up, and he positively identified Jourrell Dontai Williams as the driver of the tractor.

Hoscar Cresencio Becerra-Mejia is a citizen of Mexico, serving as a material witness in the case against Jourrell Dontai Williams. Becerra-Mejia stated he crossed the Rio Grander River into the United States illegally on November 23, 2021. Becerra-Mejia stated he transferred \$4,500 United States Dollars (USD) to an unknown bank account. He was instructed to do so via a social media application in order to get smuggled into the United States and pay an additional \$4,500 USD once he arrived in Florida. Becerra-Mejia stated once he crossed the river, he walked and ran until he arrived at an unknown street. Becerra-Mejia stated an unknown color Jeep picked him and took him to a safe house. Becerra-Mejia stated he stayed at the unknown house for two nights until he was picked up and taken to where the blue tractor was parked. Becerra-Mejia stated Williams opened the passenger side door of the tractor to let him and several other individuals inside. Becerra-Mejia stated once on board, Williams signaled them with his hand and arranged them in different spots with the sleeper. Becerra-Mejia was shown a six-person photo line-up, and he positively identified Jourrell Dontai Williams as the driver of the tractor.

SUBSCRIBED and SWORN to before me on

29th day of November, 2021

Signature of Judicial Officer

/S/ Ochoa-Hauser, Brandy M. Border Patrol Agent

Signature of Complainant